UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

May 25, 2010

Mr. Michael J. Erickson SR-6J
Associate Vice President/Principal Engineer
ARCADIS
10559 Citation Drive, Suite 100
Brighton, MI 48116

RE: Area 1 Work Plan Supplement: Baseline Ecological Risk Assessment Work Plan (Revised)

Dear Mr. Erickson:

The United States Environmental Protection Agency (EPA) has completed its review of the April 5, 2010, responses to comments and the revised Area 1 Work Plan Supplement: Baseline Ecological Risk Assessment Work Plan for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site.

The responses have adequately addressed EPA's previous comments and incorporated them into the revised document, with the exception of one comment (EPA original specific comment #5). EPA has enclosed the specific required revision to that comment that must be incorporated into the final document.

Therefore, EPA approves the Area 1 Baseline Ecological Risk Assessment Work Plan pending receipt of adequate responses to the enclosed comment and a revised final document incorporating that comment. The responses to the enclosed comment and revised document must be submitted within (45) forty-five days of receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
SFD Remedial Response Branch #1

Enclosure

cc: Paul Bucholtz, MDEQ
Gary Griffith, Georgia-Pacific
Richard Gay, Weyerhaeuser

Bcc w/enclosure:

Jeff Keiser, CH2MHILL
Leslie Kirby-Miles, ORC
James Chapman, SFD

U.S. EPA COMMENTS ON THE REVISED AREA 1 BASELINE ECOLOGICAL RISK ASSESSMENT WORK PLAN

Response to Original Comment #5:

3.4.1.1.2 Dietary Composition

The best estimate for woodcock dietary composition is Krohn (1970) because data are reported as % wet weight, which is the appropriate unit for exposure modeling since PCB concentrations in prey are reported on a wet-weight basis, not volumetric. The high fraction of grit reported by Krohn (1970) is not problematic because it can be removed and the prey composition recalculated without grit. Krohn (1970) reports dietary composition for woodcock in two habitats, woods and fields. The dietary composition in woods is 83.4 % earthworms and 16.6 % other terrestrial invertebrates (values reported without grit) (Krohn 1970 in U.S. EPA 1993). The dietary composition in fields is 84.1 % earthworms and 15.9 % other terrestrial invertebrates (including 1 % "other"), recalculated excluding the grit component (Krohn 1970 in U.S. EPA 1993). Combining woods and fields woodcock results in 84 % earthworm and 16 % other terrestrial invertebrates.

Sperry (1940) woodcock dietary composition is inappropriate because it is reported as % volume, which is incommensurate with exposure data.

Krohn, W. 1970. Woodcock feeding habits as related to summer field usage in central Maine. J Wildl Manage 34: 769-775.

Sperry, C. 1940. Food habits of a group of shore birds; woodcock, snipe, knot, and dowitcher. U.S. Dept. Int., Bur. Biol. Survey, Wildl Res Bull 1. 37 pp.

U.S. EPA. 1993. Wildlife Exposure Factors Handbook. vol. I and II. Office of Research and Development. EPA/600/R-93/187a and b.

The proposed shrew dietary composition is reported on a volumetric basis, not on a wet-weight basis commensurate with prey PCB data. It may be used only if wet-weight dietary composition data are unavailable, in which case the uncertainty for exposure modeling should be discussed.